

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANT OTTO TRUCKING LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
LETTER BRIEF IN OPPOSITION TO  
WAYMO'S MOTION TO COMPEL  
DISCOVERY AND EXHIBITS THERETO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking LLC’s Administrative  
7 Motion to File Under Seal Portions of Its Letter Brief in Opposition to Waymo’s Motion to Compel  
8 Discovery and Exhibits Thereto (the “Administrative Motion”). The Administrative Motion seeks an  
9 order sealing highlighted portions of Otto Trucking’s Letter Brief, as well as the entirety of Exhibit B  
10 to the Walsh Declaration.

11 3. The entirety of Exhibits B contains or refers to trade secret information, which Waymo  
12 seeks to seal.

13 4. Exhibit B (entire document) contains, references, and/or describes Waymo’s asserted  
14 trade secrets. The information Waymo seeks to seal includes the confidential design and functionality  
15 of Waymo’s proprietary autonomous vehicle system, including its LiDAR designs, which Waymo  
16 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-  
17 47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The public disclosure of  
18 this information would give Waymo’s competitors access to descriptions of the functionality or  
19 features of Waymo’s autonomous vehicle system. If such information were made public, I understand  
20 that Waymo’s competitive standing would be significantly harmed.

21 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibit B that merit  
22 sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on October 23, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7  
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.

11  
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven